

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

No. 2:17-cv-00642-RSM

DECLARATION OF DEREK C. CHEN

I, Derek C. Chen, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. Plaintiff served her Fourth Set of Interrogatories and Requests for Production of Documents on November 13, 2017, roughly two hours before the parties had a phone conference set to discuss other discovery requests. On the phone call, I told Plaintiff I had not had time to read the fourth set yet much less seek responsive documents, and therefore could not discuss any of those requests on the call. I confirmed the University of Washington would respond to the fourth set pursuant to the court rules.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED this 11TH day of December, 2017, at Seattle, Washington.

/s/ Derek C. Chen

Derek C. Chen, WSBA #49723

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Pro-Se Plaintiff

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DATED: December 11, 2017

/s/LaHoma Walker

LaHoma Walker, Legal Assistant